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CHURCH OF SCIENTOLOGY INTERNATIONAL

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 FOR THE COUNTY OF MARIN

12
13 CHURCH OF SCIENTOLOGY)
INTERNATIONAL, a California not-)
14 for-profit religious corporation;)

15 Plaintiff,)

16 vs.)

17 GERALD ARMSTRONG; MICHAEL WALTON;)
THE GERALD ARMSTRONG CORPORATION, a)
18 California for-profit corporation;)
Does 1 through 100, inclusive,)

19 Defendants.)
20)
21)
22)

CASE NO. 157 680

**DEFENDANT'S SEPARATE
STATEMENTS OF DOCUMENT
PRODUCTION REQUESTS AT
ISSUE**

**[FILED CONCURRENTLY WITH
PLAINTIFF'S MOTION TO
COMPEL PRODUCTION OF
DOCUMENTS FROM DEFENDANTS
GERALD ARMSTRONG AND THE
GERALD ARMSTRONG
CORPORATION, FILED UNDER
SEPARATE COVER]**

23 **SEPARATE STATEMENT CONTAINING REQUESTS FOR THE PRODUCTION OF**
24 **DOCUMENTS BY DEFENDANT GERALD ARMSTRONG**

25 **(Plaintiff's First Request for Production of Documents)**

26 Pursuant to Law and Discovery Manual § 251 et seq.,
27 plaintiff Church of Scientology International hereby presents its
28 Separate Statement in support of its concurrently filed motion to

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1 compel production of documents in response to Plaintiff's First
2 Request for the Production of Documents by Defendant Gerald
3 Armstrong.

4 **REQUEST FOR PRODUCTION No. 1:**

5 Request for Production 1:

6 All documents which in any way constitute, discuss,
7 evidence, mention, concern, relate or refer to the transfer of
8 assets, money, liabilities, literary works, works of art, shares
9 of stock or real, personal or intangible property of any kind
10 between you and the Gerald Armstrong Corporation at any time.

11 Response to Request for Production No. 1:

12 Armstrong objects on the following grounds: that the
13 request violates the right to privacy, that the request is not
14 calculated to lead to the discovery of admissible evidence, and is
15 irrelevant, constitutes discovery prohibited by the order of the
16 Superior Court of Los Angeles, is burdensome, harassive, requires
17 a compilation, and is compound, overbroad and ambiguous.

18 Reasons Why Production of Documents is Necessary:

19 The Church has requested that Armstrong produce documents
20 which relate to the transfers of his assets to Armstrong's co-
21 defendants. It is difficult to imagine material which is more
22 relevant to a fraudulent conveyance action, or more likely to lead
23 to the discovery of admissible evidence.

24 C.C.P. § 2017(a) provides that a party may obtain discovery

25 [R]egarding any matter, not privileged, that is
26 relevant to the subject matter involved in the
27 pending action... if the matter either is itself
28 calculated to lead to the discovery of admissible
evidence. Discovery may relate to the claim or
defense of the party seeking discovery or any other
party to the action.

1 The discovery provisions are interpreted liberally, with
2 all doubt resolved in favor of permitting discovery. Colonial Life
3 & Acc. Ins. Co. v. Superior Court (1982) 31 Cal.3d 785, 790, 183
4 Cal.Rptr. 810, 813, fn. 7-8; Greyhound Corp. v. Superior Court,
5 364 P.2d 266, 15 Cal.Rptr. 90; Davies v. Superior Court, 36 Cal.3d
6 291, 204 Cal.Rptr. 154.

7 During meet and confer, the Church asked that Armstrong's
8 counsel identify what he considered to be vague or unclear about
9 this request, and what about the request represented an undue
10 burden. Mr. Greene did not respond so the Church is left to wonder
11 what it is about these clear, specifically drawn requests that
12 Armstrong and his counsel do not understand. This request asks
13 for documents concerning the transfer of assets from Armstrong to
14 or for defendant the Gerald Armstrong Corporation. This is not a
15 "burdensome" request when made in the context of fraudulent
16 conveyance litigation.

17 Armstrong does not identify whose "right to privacy" is
18 allegedly violated by this request. Assuming arguendo that
19 Armstrong is attempting to assert his own privacy interests, the
20 objection is simply irrelevant to this request. The Church seeks
21 documents relating to Armstrong's transfer of assets: the very
22 subject matter of this litigation. The courts must balance the
23 privacy rights of persons subject to discovery against the right
24 of civil litigants to discover relevant facts and the public
25 interest in litigation. Vinson v. Superior Court (1987) 43 Cal.3d
26 833, 842, 239 Cal.Rptr. 292, 299; Valley Bank v. Superior Court
27 (1975) 15 Cal.3d 652, 125 Cal.Rptr. 553, 555. Even very personal
28 and confidential information may have to be disclosed if

1 "essential to a fair determination of the lawsuit." Morales v.
2 Superior Court (1979) 99 Cal.App.3d 283, 160 Cal.Rptr. 194.

3 Finally, no order exists prohibiting discovery in this
4 action. This Court has already denied not one, but two, attempts
5 by Armstrong to stay discovery herein. [Ex. E and F to Declaration
6 of Andrew Wilson] The cases pending in Los Angeles are, indeed,
7 stayed while the Court of Appeal considers Armstrong's appeal of
8 the preliminary injunction which that Court granted to the Church.
9 Discovery there, however, has nothing to do with discovery here.
10 Nothing in any order of the Los Angeles court can reasonably be
11 construed to prohibit, stay or interfere with discovery here; at
12 most, the stay in those cases has put discovery therein on hold.

13 **REQUEST FOR PRODUCTION No. 2:**

14 Request for Production N. 2:

15 All documents which in any way constitute, discuss,
16 evidence, mention, concern, relate or refer to the transfer of
17 assets, money, liabilities, literary works, works of art, shares
18 of stock or real, personal, or intangible property of any kind
19 between you and Michael Walton at any time.

20 Response to Request For Production No. 2:

21 Armstrong objects on the following grounds: that the
22 request violates the right to privacy, that the request is not
23 calculated to lead to the discovery of admissible evidence, and is
24 irrelevant, constitutes discovery prohibited by the order of the
25 Superior Court of Los Angeles, is burdensome, harassive, requires
26 a compilation, and is compound, overbroad and ambiguous.

27 Reasons Why Production of Documents Is Necessary:

28 See argument regarding Request No. 1, above.

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REQUEST FOR PRODUCTION No. 3:

Request for Production No. 3:

All documents which in any way constitute, discuss, mention, concern, relate or refer to that document shown on Entertainment Television's "Entertainment Tonight" on August 5, 1993 and bearing the designation: "ONE HELL OF A STORY An Original Treatment Written for Motion Picture Purposes Created and Written by Gerald Armstrong."

Response to Request for Production No. 3:

Armstrong objects on the following grounds: that the request violates the right to privacy and the right to freedom of religion, speech, press and association, that the request is not calculated to lead to the discovery of admissible evidence, and is irrelevant, constitutes discovery prohibited by the order of the Superior Court of Los Angeles, and is burdensome and harassive.

Reasons Why Production of Documents is Necessary:

On August 5, 1993, Armstrong boasted on national television that he had developed, and was trying to sell, a screenplay. The Church has requested that Armstrong produce documents which relate to the creation, transfer, sale or exploitation of this and other literary and artistic assets. These matters are directly relevant to the issue of Armstrong's assets and whether and how he may be attempting to transfer them out of his apparent direct control to avoid obligations owed to the Church.

C.C.P. § 2017(a) provides that a party may obtain discovery

[R]egarding any matter, not privileged, that is relevant to the subject matter involved in the pending action... if the matter either is itself calculated to lead to the discovery of admissible evidence. Discovery may relate to the claim or defense of the party seeking discovery or any other

1 party to the action.

2 The discovery provisions are interpreted liberally, with
3 all doubt resolved in favor of permitting discovery. Colonial Life
4 & Acc. Ins. Co. v. Superior Court (1982) 31 Cal.3d 785, 790, 183
5 Cal.Rptr. 810, 813, fn. 7-8; Greyhound Corp. v. Superior Court,
6 364 P.2d 266, 15 Cal.Rptr. 90; Davies v. Superior Court, 36 Cal.3d
7 291, 204 Cal.Rptr. 154.

8 During meet and confer, the Church asked that Armstrong's
9 counsel identify what he considered to be vague or unclear about
10 this request, and what about the request represented an undue
11 burden. Mr. Greene did not respond so the Church is left to wonder
12 what it is that Armstrong and his counsel do not understand and in
13 what manner this request might be construed to be "burdensome and
14 harassive."

15 Armstrong does not identify whose "right to privacy" is
16 allegedly violated by this request. Assuming arguendo that
17 Armstrong is attempting to assert his own privacy interests, the
18 objections is simply irrelevant to this request. Further,
19 Armstrong can hardly claim a "privacy" interest in a document
20 which he displayed on national television.

21 The Church seeks documents relating to Armstrong's transfer
22 of assets: the very subject matter of this litigation. The courts
23 must balance the privacy rights of persons subject to discovery
24 against the right to civil litigants to discover relevant facts
25 and the public interest in litigation. Vinson v. Superior Court
26 (1987) 43 Cal.3d 833, 842, 239 Cal.Rptr. 292, 299; Valley Bank v.
27 Superior Court (1975) 15 Cal.3d 652, 125 Cal.Rptr. 553, 555. Even
28 very personal and confidential information may have to be

1 disclosed if "essential to a fair determination of the lawsuit."
2 Morales v. Superior Court (1979) 99 Cal.App.3d 283, 160 Cal.Rptr.
3 194.

4 Armstrong has offered no explanation as to how the Church's
5 reasonable requests for documents relating to his assets could
6 possibly violate any of Armstrong's First Amendment rights. This
7 action is directed at Armstrong's conveyance of assets so as to
8 essentially render himself judgment proof, while at the same time
9 engaging in what he admits (and in fact boasts of) were breaches
10 of the December, 1986 settlement agreement with the Church. The
11 Church has been unable to find any authority which even remotely
12 suggests that Armstrong may refuse to produce documents relative
13 to his assets in a fraudulent conveyance action by claiming that
14 such production would somehow violate his right to freely practice
15 his religion, or associate with persons of his choice. The
16 Church's request that Armstrong supply such authority, if any
17 exists, was met with silence. [Ex. C to, and ¶ 2 of Declaration of
18 Andrew Wilson]

19 Finally, no order exists prohibiting discovery in this
20 action. This Court has already denied not one, but two, attempts
21 by Armstrong to stay discovery herein. [Ex. E and F to Declaration
22 of Andrew Wilson] The cases pending in Los Angeles are, indeed,
23 stayed while the Court of Appeal considers Armstrong's appeal of
24 the preliminary injunction which that Court granted to the Church.
25 Discovery there, however, has nothing to do with discovery here.
26 Nothing in any order of the Los Angeles court can reasonably be
27 construed to prohibit, stay or interfere with discovery here; at
28 most, the stay in those cases has put discovery therein on hold.

1 **REQUEST FOR PRODUCTION No. 4:**

2 Request for Production No. 4:

3 All documents which in any way constitute, mention,
4 concern, relate or refer to any motion picture, documentary, video
5 treatment, teleplay, screenplay, article, story, treatment,
6 project or script prepared by you which contains any reference to
7 plaintiff, or Scientology, or any of the entities or individuals
8 listed in paragraph 1 of the "Mutual Release of All Claims and
9 Settlement Agreement" of December, 1986.

10 Response to Request for Production No. 4:

11 Armstrong objects on the following grounds: that the
12 request violates the right to privacy and the right to freedom of
13 religion, speech, press and association, that the request is not
14 calculated to lead to the discovery of admissible evidence, and is
15 irrelevant, constitutes discovery prohibited by the order of the
16 Superior Court of Los Angeles, and is burdensome, and harassive.

17 Reasons Why Production of Documents is Necessary:

18 The Church has requested that Armstrong produce documents
19 relating to the creation, transfer, sale or exploitation of
20 literary and artistic assets. These matters are directly relevant
21 to the issue of Armstrong's assets and whether and how he may be
22 attempting to transfer them out of his apparent direct control to
23 avoid obligations owed to the Church.

24 C.C.P. § 2017(a) provides that a party may obtain discovery

25 [R]egarding any matter, not privileged, that is relevant to
26 the subject matter involved in the pending action... if the
27 matter either is itself calculated to lead to the discovery
28 of admissible evidence. Discovery may relate to the claim
or defense of the party seeking discovery or any other
party to the action.

1 The discovery provisions are interpreted liberally, with
2 all doubt resolved in favor of permitting discovery. Colonial Life
3 & Acc. Ins. Co. v. Superior Court (1982) 31 Cal.3d 785, 790, 183
4 Cal.Rptr. 810, 813, fn. 7-8; Greyhound Corp. v. Superior Court,
5 364 P.2d 266, 15 Cal.Rptr. 90; Davies v. Superior Court, 36 Cal.3d
6 291, 204 Cal.Rptr. 154.

7 During meet and confer, the Church asked that Armstrong's
8 counsel identify what he considered to be vague or unclear, and
9 what about the request represented an undue burden. Mr. Greene did
10 not respond so the Church is left to wonder what it is that
11 Armstrong and his counsel do not understand. This request seeks
12 documents concerning the creation, sale, exploitation or transfer
13 of literary and artistic assets by Armstrong. This is not a
14 "burdensome" request when made in the context of fraudulent
15 conveyance litigation.

16 Armstrong does not identify whose "right to privacy" is
17 allegedly violated by this request. Assuming arguendo that
18 Armstrong is attempting to assert his own privacy interests, the
19 objection is simply irrelevant to this request. The Church seeks
20 documents relating to Armstrong's transfer of assets: the very
21 subject matter of this litigation. The courts must balance the
22 privacy rights of persons subject to discovery against the right
23 to civil litigants to discover relevant facts and the public
24 interest in litigation. Vinson v. Superior Court (1987) 43 Cal.3d
25 833, 842, 239 Cal.Rptr. 292, 299; Valley Bank v. Superior Court
26 (1975) 15 Cal.3d 652, 125 Cal.Rptr. 553, 555. Even very personal
27 and confidential information may have to be disclosed if
28 "essential to a fair determination of the lawsuit." Morales v.

1 Superior Court (1979) 99 Cal.App.3d 283, 160 Cal.Rptr. 194.

2 Armstrong has offered no explanation as to how the Church's
3 reasonable request for documents relating to his assets could
4 possibly violate any of Armstrong's First Amendment rights. This
5 action is directed at Armstrong's conveyance of assets so as to
6 essentially render himself judgment proof, while at the same time
7 engaging in what he admits (and in fact boasts of) were breaches
8 of the December, 1986 settlement agreement with the Church. The
9 Church has been unable to find any authority which even remotely
10 suggests that Armstrong may refuse to produce documents relative
11 to his assets in a fraudulent conveyance action by claiming that
12 such production would somehow violate his right to freely practice
13 his religion, or associate with persons of his choice. The
14 Church's request that Armstrong supply such authority, if any
15 exists, was met with silence. [Ex. C to Declaration of Andrew
16 Wilson.]

17 Finally, no order exists prohibiting discovery in this
18 action. This Court has already denied not one, but two, attempts
19 by Armstrong to stay discovery herein. [Ex. E and F to Declaration
20 of Andrew Wilson] The cases pending in Los Angeles are, indeed,
21 stayed while the Court of Appeal considers Armstrong's appeal of
22 the preliminary injunction which that Court granted to the Church.
23 Discovery there, however, has nothing to do with discovery here.
24 Nothing in any order of the Los Angeles court can reasonably be
25 construed to prohibit, stay or interfere with discovery here; at
26 most, the stay in those cases has put discovery therein on hold.

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REQUEST FOR PRODUCTION No. 5:

Request for Production No. 5:

All correspondence of any kind received by you or the Gerald Armstrong Corporation from Entertainment Television, its employees, agents, representatives, attorneys, officers, directors or assigns, after December 6, 1986, which relates to or concerns the plaintiff, Scientology, or any of the entities or individuals listed or referred to in paragraph 1 of the "Mutual Release of all Claims and Settlement Agreement" of December, 1986.

Response to Request for Production No. 5:

Armstrong objects on the following grounds: that the request violates the right to privacy and the right to freedom of religion, speech, press and association, that the request is not calculated to lead to the discovery of admissible evidence, and is irrelevant, constitutes discovery prohibited by the order of the Superior Court of Los Angeles, and is ambiguous, overbroad, vague, burdensome, and harassive.

Reasons Why Production of Documents is Necessary:

The Church has requested that Armstrong produce correspondence received from Entertainment Television concerning the plaintiff in this action, the Scientology religion, or any of the entities and individuals listed in the settlement agreement Armstrong entered into with the Church in December, 1986. On August 5, 1993, Armstrong boasted on national television that he had developed, and was trying to sell, a screenplay. This request seeks documents relating to that appearance and to the creation, transfer, sale or exploitation of Armstrong's literary and artistic assets.

1 C.C.P. § 2017(a) provides that a party may obtain discovery
2 [R]egarding any matter, not privileged, that is relevant to
3 the subject matter involved in the pending action... if the
4 matter either is itself calculated to lead to the discovery
5 of admissible evidence. Discovery may relate to the claim
6 or defense of the party seeking discovery or any other
7 party to the action.

8 The discovery provisions are interpreted liberally, with
9 all doubt resolved in favor of permitting discovery. Colonial Life
10 & Acc. Ins. Co. v. Superior Court (1982) 31 Cal.3d 785, 790, 183
11 Cal.Rptr. 810, 813, fn. 7-8; Greyhound Corp. v. Superior Court,
12 364 P.2d 266, 15 Cal.Rptr. 90; Davies v. Superior Court, 36 Cal.3d
13 291, 204 Cal.Rptr. 154.

14 During meet and confer, the Church asked that Armstrong's
15 counsel identify what he considered to be vague or unclear about
16 this request, and what about the request represented an undue
17 burden. Mr. Greene did not respond, so the Church is left to
18 wonder what it is that Armstrong and his counsel do not
19 understand. This request asks for documents concerning an
20 appearance by Armstrong on national television, during which he
21 boasted that he had developed, and was trying to sell, a
22 screenplay. This request seeks documents relating to the
23 creation, transfer, sale or exploitation of literary and artistic
24 assets by Armstrong. This is not a "burdensome" request when made
25 in the context of fraudulent conveyance litigation.

26 Armstrong does not identify whose "right to privacy" is
27 allegedly violated by this request. Assuming arguendo that
28 Armstrong is attempting to assert his own privacy interests, the
objections is simply irrelevant to this request. Further,
Armstrong can hardly claim a "privacy" interest in documents

1 regarding an appearance by him on a national television program.

2 The Church seeks documents relating to Armstrong's
3 creation, sale, exploitation and transfer of assets: the very
4 subject matter of this litigation. The courts must balance the
5 privacy rights of persons subject to discovery against the right
6 to civil litigants to discover relevant facts and the public
7 interest in litigation. Vinson v. Superior Court (1987) 43 Cal.3d
8 833, 842, 239 Cal.Rptr. 292, 299; Valley Bank v. Superior Court
9 (1975) 15 Cal.3d 652, 125 Cal.Rptr. 553, 555. Even very personal
10 and confidential information may have to be disclosed if
11 "essential to a fair determination of the lawsuit." Morales v.
12 Superior Court (1979) 99 Cal.App.3d 283, 160 Cal.Rptr. 194.

13 Armstrong has offered no explanation as to how the Church's
14 reasonable requests for documents relating to his assets could
15 possibly violate any of Armstrong's First Amendment rights. This
16 action is directed at Armstrong's conveyance of assets to as to
17 essentially render himself judgment proof, while at the same time
18 engaging in what he admits (and in fact boasts of) were breaches
19 of the December, 1986 settlement agreement with the Church. The
20 Church has been unable to find any authority which even remotely
21 suggests that Armstrong may refuse to produce documents relative
22 to his assets in a fraudulent conveyance action by claiming that
23 such production would somehow violate his right to freely practice
24 his religion, or associate with persons of his choice. The
25 Church's request that Armstrong supply such authority, if any
26 exists, was met with silence. [Ex. C to Declaration of Andrew
27 Wilson]

28 Finally, no order exists prohibiting discovery in this

1 action. This Court has already denied not one, but two, attempts
2 by Armstrong to stay discovery herein. [Ex. E and F to Declaration
3 of Andrew Wilson] The cases pending in Los Angeles are, indeed,
4 stayed while the Court of Appeal considers Armstrong's appeal of
5 the preliminary injunction which that Court granted to the Church.
6 Discovery there, however, has nothing to do with discovery here.
7 Nothing in any order of the Los Angeles court can reasonably be
8 construed to prohibit, stay or interfere with discovery here; at
9 most, the stay in those cases has put discovery therein on hold.

10 **REQUEST FOR PRODUCTION No. 6:**

11 Request for Production No. 6:

12 All correspondence of any kind sent by you or the Gerald
13 Armstrong Corporation to Entertainment Television, its employees,
14 agents, representatives, attorneys, officers, directors or
15 assigns, after December 6, 1986, which relates to or concerns the
16 plaintiff, Scientology, or any of the entities or individuals
17 listed or referred to in paragraph 1 of the "Mutual Release of All
18 Claims and Settlement Agreement" of December, 1986.

19 Response to Request for Production No. 6:

20 Armstrong objects on the following grounds: that the
21 request violates the right to privacy and the right to freedom of
22 religion, speech, press and association, that the request is not
23 calculated to lead to the discovery of admissible evidence, and is
24 irrelevant, constitutes discovery prohibited by the order of the
25 Superior Court of Los Angeles, and is ambiguous, overbroad, vague,
26 burdensome, and harassive.

27 Reasons Why Production of Documents is Necessary:

28 See argument regarding Request No. 5, above.

1 **REQUEST FOR PRODUCTION No. 7:**

2 Request for Production No. 7:

3 All correspondence of any kind sent by you or the Gerald
4 Armstrong Corporation to anyone which in any way discusses,
5 mentions, concerns, relates or refers to that document shown on
6 Entertainment Television's "Entertainment Tonight" on August 5,
7 1993, and bearing the designation: "ONE HELL OF A STORY An
8 Original Treatment Written for Motion Picture Purposes Created and
9 written by Gerald Armstrong."

10 Response to Request for Production No. 7:

11 Armstrong objects on the following grounds: that the
12 request violates the right to privacy and the right to freedom of
13 religion, speech, press and association, that the request is not
14 calculated to lead to the discovery of admissible evidence, and is
15 irrelevant, constitutes discovery prohibited by the order of the
16 Superior Court of Los Angeles, and is ambiguous, overbroad, vague,
17 burdensome, and harassive.

18 Reasons Why Production of Documents is Necessary:

19 See argument regarding Request No. 3, above.

20 **REQUEST FOR PRODUCTION No. 8:**

21 Request for Production No. 8:

22 All correspondence of any kind received by you or the
23 Gerald Armstrong Corporation from anyone which in any way
24 discusses, mentions, concerns, relates or refers to that document
25 shown on Entertainment Television's "Entertainment Tonight" on
26 August 5, 1993, and bearing the designation: "ONE HELL OF A STORY
27 An Original Treatment Written for Motion Picture Purposes Created
28 and Written by Gerald Armstrong."

1 Response to Request for Production No. 8:

2 Armstrong objects on the following grounds: that the
3 request violates the right to privacy and the right to freedom of
4 religion, speech, press and association, that the request is not
5 calculated to lead to the discovery of admissible evidence, and is
6 irrelevant, constitutes discovery prohibited by the order of the
7 Superior Court of Los Angeles, and is ambiguous, overbroad, vague,
8 burdensome, and harassive.

9 Reasons Why Production of Documents is Necessary:

10 See argument regarding Request No. 3, above.

11 **REQUEST FOR PRODUCTION No. 9:**

12 Request for Production No. 9:

13 All correspondence of any kind sent by you or the Gerald
14 Armstrong Corporation to anyone which in any way discusses,
15 mentions, concerns relates or refers to any document authored by
16 you, in whole or in part, including but not limited to
17 manuscripts, screenplays, motion picture treatments,
18 "fictionalizations," play, articles, or scripts, which discuss,
19 mention, concern, relate, or refer to the plaintiff, Scientology
20 or any of the entities or individuals listed or referred to in
21 paragraph 1 of the "Mutual Release of All Claims and Settlement
22 Agreement," of December, 1986.

23 Response to Request for Production No. 9:

24 Armstrong objects on the following grounds: that the
25 request violates the right to privacy and the right to freedom of
26 religion, speech, press and association, that the request is not
27 calculated to lead to the discovery of admissible evidence, and is
28 irrelevant, constitutes discovery prohibited by the order of the

1 Superior Court of Los Angeles, and is ambiguous, overbroad, vague,
2 burdensome, and harassive.

3 Reasons Why Production of Documents is Necessary:

4 See argument regarding Request No. 4, above.

5 **REQUEST FOR PRODUCTION No. 10:**

6 Request for Production No. 10:

7 All correspondence of any kind received by you or the
8 Gerald Armstrong Corporation from anyone which in any way
9 discusses, mentions, concerns, relates or refers to any document
10 authored by you, in whole or in part, including but not limited to
11 manuscripts, screenplays, motion picture treatments,
12 "fictionalizations," plays, articles, or scripts, which discuss,
13 mention, concern, relate, or refer to the plaintiff, Scientology,
14 or any of the entities or individuals listed or referred to in
15 paragraph 1 of the "Mutual Release of All Claims and Settlement
16 Agreement" of December 1986.

17 Response to Request for Production No. 10:

18 Armstrong objects on the following grounds: that the
19 request violates the right to privacy and the right to freedom of
20 religion, speech, press and association, that the request is not
21 calculated to lead to the discovery of admissible evidence, and is
22 irrelevant, constitutes discovery prohibited by the order of the
23 Superior Court of Los Angeles, and is ambiguous, overbroad, vague,
24 burdensome, and harassive.

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1 Reasons Why Production of Documents is Necessary:

2 See argument regarding Request No. above.

3 Dated: November 23, 1993

BOWLES & MOXON

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By: /s/ Laurie J. Bartilson LAW

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Laurie J. Bartilson

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BOWLES & MOXON

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Andrew H. Wilson

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WILSON, RYAN & CAMPILONGO

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Attorneys for Plaintiff

Church of Scientology

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